

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE

MARCOS IGNACIO MARQUEZ HERNANDEZ  
MARGARITA ABREU GONZALEZ

DEBTORS

CASE NO 13-09987/MCF

CHAPTER 13

DEBTORS' MOTION AND NOTICE OF FILING OF  
AMENDED SCHEDULE "J" AND CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

NOW COME, MARCOS IGNACIO MARQUEZ HERNANDEZ and MARGARITA ABREU GONZALEZ, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors are hereby submitting *Amended Schedule "J"*, dated December 11, 2013, herewith and attached to this motion.
2. This amendment to Schedule "J" is filed to state debtors' actual expenses.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 1009(b)

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

Page -2-  
Notice of Amended Schedules "I" & "J"  
Case no. 13-09987/MCF13

### **CERTIFICATE OF SERVICE**

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular US mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 12<sup>th</sup> day of December, 2013.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONERS  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX 787-746-5294  
Email: rfigueroa@rfclawpr.com

**Fill in this information to identify your case:**

Debtor 1 MARCOS IGNACIO MARQUEZ HERNANDEZ  
First Name Middle Name Last Name

Debtor 2 MARGARITA ABREU GONZALEZ  
(Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: District of Puerto Rico

Case number 3:13-bk-9987  
(If known)

Check if this is:

- ☒ An amended filing
- ☐ A supplement showing post-petition chapter 13 expenses as of the following date:  
 MM / DD / YYYY
- ☐ A separate filing for Debtor 2 because Debtor 2 maintains a separate household

Official Form 6J

**Schedule J: Your Expenses**

12/13

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach another sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

**Part 1: Describe Your Household**

**1. Is this a joint case?**

- ☐ No. Go to line 2.
- ☒ Yes. Does Debtor 2 live in a separate household?
- ☒ No
- ☐ Yes. Debtor 2 must file a separate Schedule J.

**2. Do you have dependents?**

Do not list Debtor 1 and Debtor 2.

Do not state the dependents' names.

- ☐ No
- ☒ Yes. Fill out this information for each dependent.....

Dependent's relationship to Debtor 1 or Debtor 2

Dependent's age

Does dependent live with you?

Son

18

- ☐ No
- ☐ Yes

Daughter

16

- ☐ No
- ☐ Yes

- ☐ No
- ☐ Yes

- ☐ No
- ☐ Yes

- ☐ No
- ☐ Yes

**3. Do your expenses include expenses of people other than yourself and your dependents?**

- ☒ No
- ☐ Yes

**Part 2: Estimate Your Ongoing Monthly Expenses**

Estimate your expenses as of your bankruptcy filing date unless you are using this form as a supplement in a Chapter 13 case to report expenses as of a date after the bankruptcy is filed. If this is a supplemental *Schedule J*, check the box at the top of the form and fill in the applicable date.

Include expenses paid for with non-cash government assistance if you know the value of such assistance and have included it on *Schedule I: Your Income* (Official Form 6I.)

**Your expenses**

**4. The rental or home ownership expenses for your residence. Include first mortgage payments and any rent for the ground or lot.**

4. \$ 0.00

If not included in line 4:

4a. Real estate taxes

4a. \$ 0.00

4b. Property, homeowner's, or renter's insurance

4b. \$ 0.00

4c. Home maintenance, repair, and upkeep expenses

4c. \$ 0.00

4d. Homeowner's association or condominium dues

4d. \$ 0.00



Debtor 1 **MARCOS IGNACIO MARQUEZ HERNANDEZ**  
First Name Middle Name Last Name

Case number (if known) **3:13-bk-9987**

		Your expenses
5.	<b>Additional mortgage payments for your residence, such as home equity loans</b>	\$ <u>0.00</u>
6.	<b>Utilities:</b>	
6a.	Electricity, heat, natural gas	\$ <u>160.15</u>
6b.	Water, sewer, garbage collection	\$ <u>50.00</u>
6c.	Telephone, cell phone, Internet, satellite, and cable services	\$ <u>178.00</u>
6d.	Other. Specify: <u>See Schedule Attached</u>	\$ <u>100.00</u>
7.	<b>Food and housekeeping supplies</b>	\$ <u>600.00</u>
8.	<b>Childcare and children's education costs</b>	\$ <u>0.00</u>
9.	<b>Clothing, laundry, and dry cleaning</b>	\$ <u>25.00</u>
10.	<b>Personal care products and services</b>	\$ <u>0.00</u>
11.	<b>Medical and dental expenses</b>	\$ <u>20.00</u>
12.	<b>Transportation.</b> Include gas, maintenance, bus or train fare. Do not include car payments.	\$ <u>0.00</u>
13.	<b>Entertainment, clubs, recreation, newspapers, magazines, and books</b>	\$ <u>100.00</u>
14.	<b>Charitable contributions and religious donations</b>	\$ <u>0.00</u>
15.	<b>Insurance.</b> Do not include insurance deducted from your pay or included in lines 4 or 20.	
15a.	Life insurance	\$ <u>0.00</u>
15b.	Health insurance	\$ <u>0.00</u>
15c.	Vehicle insurance	\$ <u>0.00</u>
15d.	Other insurance. Specify: _____	\$ <u>0.00</u>
16.	<b>Taxes.</b> Do not include taxes deducted from your pay or included in lines 4 or 20. Specify: _____	\$ <u>0.00</u>
17.	<b>Installment or lease payments:</b>	
17a.	Car payments for Vehicle 1	\$ <u>0.00</u>
17b.	Car payments for Vehicle 2	\$ <u>0.00</u>
17c.	Other. Specify: _____	\$ <u>0.00</u>
17d.	Other. Specify: _____	\$ <u>0.00</u>
18.	<b>Your payments of alimony, maintenance, and support that you did not report as deducted from your pay on line 5, Schedule I, Your Income (Official Form 6I).</b>	\$ <u>0.00</u>
19.	<b>Other payments you make to support others who do not live with you.</b> Specify: _____	\$ <u>0.00</u>
20.	<b>Other real property expenses not included in lines 4 or 5 of this form or on Schedule I: Your Income.</b>	
20a.	Mortgages on other property	\$ <u>0.00</u>
20b.	Real estate taxes	\$ <u>0.00</u>
20c.	Property, homeowner's, or renter's insurance	\$ <u>0.00</u>
20d.	Maintenance, repair, and upkeep expenses	\$ <u>0.00</u>
20e.	Homeowner's association or condominium dues	\$ <u>0.00</u>

Debtor 1 **MARCOS IGNACIO MARQUEZ HERNANDEZ**  
First Name Middle Name Last Name

Case number (if known) **3:13-bk-9987**

21. Other. Specify: See Schedule Attached

21. +\$ 420.00

22. Your monthly expenses. Add lines 4 through 21.

The result is your monthly expenses.

22. \$ 1,653.15

23. Calculate your monthly net income.

23a. Copy line 12 (your combined monthly income) from Schedule I.

23a. \$ 2,093.15

23b. Copy your monthly expenses from line 22 above.

23b. - \$ 1,653.15

23c. Subtract your monthly expenses from your monthly income.

The result is your monthly net income.

23c. \$ 440.00

24. Do you expect an increase or decrease in your expenses within the year after you file this form?

For example, do you expect to finish paying for your car loan within the year or do you expect your mortgage payment to increase or decrease because of a modification to the terms of your mortgage?

☒ No.

☐ Yes.

None

IN RE MARQUEZ HERNANDEZ, MARCOS IGNACIO & ABREU GONZALEZ, MARGARITA Case No. 3:13-bk-9987  
Debtor(s)

**AMENDED SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S)**  
**Continuation Sheet - Page 1 of 1**

---

Other Utilities (DEBTOR)	
Cable Tv	70.00
Gas	30.00
Other Expenses (DEBTOR)	
Gasoline	270.00
Daily School Expenses	50.00
University Expenses	100.00

B6 Declaration (Official Form 6 - Declaration) (12/07)

IN RE MARQUEZ HERNANDEZ, MARCOS IGNACIO & ABREU GONZALEZ, MARGARITA Case No. 3:13-bk-9987  
Debtor(s) (If known)

**AMENDED DECLARATION CONCERNING DEBTOR'S SCHEDULES**

**DECLARATION UNDER PENALTY OF PERJURY BY INDIVIDUAL DEBTOR**

I declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of - 4 - <sup>schedule "J"</sup> sheets, and that they are true and correct to the best of my knowledge, information, and belief.

Date: December 11, 2013 Signature: /s/ MARCOS I MARQUEZ HERNANDEZ  
MARCOS I MARQUEZ HERNANDEZ Debtor

Date: December 11, 2013 Signature: /s/ MARGARITA ABREU GONZALEZ  
MARGARITA ABREU GONZALEZ (Joint Debtor, if any)  
[If joint case, both spouses must sign.]

**DECLARATION AND SIGNATURE OF NON-ATTORNEY BANKRUPTCY PETITION PREPARER (Sec 11 U.S.C. § 110)**

I declare under penalty of perjury that: (1) I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110; (2) I prepared this document for compensation and have provided the debtor with a copy of this document and the notices and information required under 11 U.S.C. §§ 110(b), 110(h), and 342 (b); and, (3) if rules or guidelines have been promulgated pursuant to 11 U.S.C. § 110(h) setting a maximum fee for services chargeable by bankruptcy petition preparers, I have given the debtor notice of the maximum amount before preparing any document for filing for a debtor or accepting any fee from the debtor, as required by that section.

Printed or Typed Name and Title, if any, of Bankruptcy Petition Preparer Social Security No. (Required by 11 U.S.C. § 110.)  
*If the bankruptcy petition preparer is not an individual, state the name, title (if any), address, and social security number of the officer, principal, responsible person, or partner who signs the document.*

Address

Signature of Bankruptcy Petition Preparer Date

Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document, unless the bankruptcy petition preparer is not an individual:

*If more than one person prepared this document, attach additional signed sheets conforming to the appropriate Official Form for each person.*

*A bankruptcy petition preparer's failure to comply with the provision of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both. 11 U.S.C. § 110; 18 U.S.C. § 156.*

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the \_\_\_\_\_ (the president or other officer or an authorized agent of the corporation or a member or an authorized agent of the partnership) of the \_\_\_\_\_ (corporation or partnership) named as debtor in this case, declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of \_\_\_\_\_ sheets (total shown on summary page plus 1), and that they are true and correct to the best of my knowledge, information, and belief.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

(Print or type name of individual signing on behalf of debtor)

*[An individual signing on behalf of a partnership or corporation must indicate position or relationship to debtor.]*

*Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. §§ 152 and 3571.*



MARQUEZ HERNANDEZ, MARCOS  
IGNACIO  
Bo Mariana Box 225 13  
Naguabo, PR 00718

DTOP  
PO Box 41269 MINILLAS STATION  
SAN JUAN, PR 00940-1269

ABREU GONZALEZ, MARGARITA  
Bo Mariana Box 225 13  
Naguabo, PR 00718-3076

Firstbank Pr  
PO Box 982235  
El Paso, TX 79998

R. Figueroa Carrasquillo Law Office  
PO Box 186  
Caguas, PR 00726-0186

Gecrb/jcp PR  
PO Box 965007  
Orlando, FL 32896

Asociacion De Empleados De Gobierno  
PO Box 70199  
San Juan, PR 00936-8199

Portfolio Rc  
120 Corporate Blvd Ste 1  
Norfolk, VA 23502

Banco Popular De Puert  
209 Munoz Rivera Ave  
San Juan, PR 00918

Sears/cbna  
PO Box 6189  
Sioux Falls, SD 57117

Bk Of Amer  
PO Box 982235  
El Paso, TX 79998

Sistema De Retiro Para Maestros  
PO Box 191879  
San Juan, PR 00919-1879

Bp-crlne  
PO Box 2708  
San Juan, PR 00936

Cach Llc  
4340 S Monaco St Unit 2  
Denver, CO 80237

Citi  
PO Box 6243  
Sioux Falls, SD 57117-6243

Citimortgage Inc  
PO Box 9438,dept 0251  
Gaithersburg, MD 20898